

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 05-30074-MAP

TAMMY WALKER,)
Plaintiff)
)
V.)
)
CITY OF HOLYOKE,)
Defendant)

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Now come the plaintiff, Tammy Walker) and the defendant, City of Holyoke, and respectfully jointly request that the discovery deadline be extended for a period of 120 days. Currently, the discovery deadline is June 30, 2006. As reason for this request, the parties state that the plaintiff has just recently retained Attorney Ozell Hudson, Jr., to represent her, who will require this additional time to get up to speed on this case. Moreover, the additional time is needed for the parties to conduct several depositions, including five previously noticed by Plaintiff. Also, time is needed to complete the written discovery process, which includes interrogatories, request for documents, and the obtainment of plaintiff's non-privileged medical records from her providers, either through confidentiality agreement and/or signed authorizations, which have been forwarded to the plaintiff, or through keeper of records depositions, if necessary. The Plaintiff is still collecting certain documents that she has agreed to produce. Moreover, Plaintiff's substitute attorney requires additional time to confirm the extent of both parties prior compliance with automatic disclosure requirements, and complete those disclosures if appropriate. In essence, discovery can not be completed within the time permitted

due to the volume of information still to be produced, and the number of witnesses to be deposed, which will require coordination between the schedules of the attorneys and witnesses.

WHEREFORE, the parties respectfully request that the discovery deadline be extended 120 days to October 28, 2006.

The Plaintiff,
Tammy Walker,
By Her Attorney

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